

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

PAULA COX, Individually, and as Executrix
and Personal Representative of the Estate of
ROBERT WAYNE COX,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION, LLC.;
SYNGENTA AG; and CHEVRON U.S.A.,
INC.

Defendants.

Case No.: _____

**PERSONAL INJURY/PRODUCT
LIABILITY ACTION**

JURY TRIAL DEMANDED

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, Plaintiff Paula Cox, Individually, and as Executrix and Personal Representative of the Estate of Robert Wayne Cox ("Plaintiff") hereby responds to the Court's Interrogatories.

PLAINTIFF'S ANSWERS TO LOCAL CIVIL RULE 26.01 INTERROGATORIES

- A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Upon information and belief, no known subrogation interest exists at this time.

- B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: This action is brought pursuant to S.C. Code Ann. § 15-5-90 and S.C. Code Ann. § 15-51-10. Under these statutes, Plaintiff is entitled to have these claims tried by a jury. In the complaint, Plaintiff demands a jury trial pursuant to Fed. R. Civ. P. 38(b).

- C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Plaintiff is an individual and not a publicly owned company.

- D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: A substantial part of the events or omissions giving rise to the claim occurred in Williamsburg County. As such, pursuant to Local Rule 3.01(A)(1), the Florence Division is the proper division for this action.

- E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

This action is not related, in whole or in part, to any other matter filed in this District.

Dated this 12 day of December, 2022.

Respectfully submitted,

MOTLEY RICE

/s/Chelsea L. Monroe

Chelsea L. Monroe
South Carolina Bar #: 12542
cmonroe@motleyrice.com
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Telephone: (843) 216-9018
Facsimile: (843) 216-9450

ATTORNEY FOR PLAINTIFF